

## CSM LEGAL, P.C.

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June 22, 2023

BY ECF  
Honorable Ona T. Wang  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

*Time to submit the  
Rule 68 Offer of Judgment  
extended to July 14, 2023  
so ordered.  
J. C. Bianco  
U.S.D.S.  
7/5/23*

Re: Perez et al v. Hornitos Restaurant Corp. et al  
21-cv-06641

Your Honor:

This firm represents Plaintiff in the above-referenced matter. The parties will be resolving this case through a Rule 68 Offer of Judgment (the "Offer") pursuant to *Mei Xing Yu v. Hasaki Rest., Inc.*, 944 F.3d 395, 414 (2d Cir. 2019). However, the parties need a bit more time to finalize the Offer and execute it. As such, the parties respectfully request that the deadline to submit settlement materials to the Court by June 22, 2023 be converted to a deadline to submit the Offer, and be extended by two weeks. This is the first request of its kind and is submitted on consent.

The parties thank the Court for its time and attention to this matter.

Respectfully Submitted,

/s/Mary Bianco  
Mary Bianco, Esq.  
CSM Legal P.C.  
Attorneys for Plaintiff